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Environmental Inc.
Company

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Carrie

5/9/1990

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CERTIFIED MAIL

May 9, 1990

Ms. Cindy Gilder
Supervisor
Hazardous Waste Permits Section
Washington Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

RECEIVED
MAY 14 1990
WASTE MANAGEMENT BRANCH

Re: Submittal of Revised Part B Permit Applications for
Chemical Processors, Inc. Pier 91 and Kent Facilities

Dear Ms. Gilder:

Susan Donahue and I enjoyed meeting with you at your office last week, and thank you and Robert Carruthers for the opportunity to discuss issues related to completion of the Part B Permit Applications for Chemical Processors, Inc. facilities.

At our meeting last week, we discussed your letter of April 24, 1990 which constituted Ecology's first NOD for Chempro's Pier 91 and Kent facilities. As indicated during the meeting, we will provide revisions for the Pier 91 Part B Permit Application by July 1, 1990 (the date requested in your NOD). The July 1 submittal package will incorporate revisions sent to you recently for the Tacoma and Georgetown facilities, and those to be sent at the end of this month for the Washougal Facility.

Your letter requested submittal of a revised Kent Facility Part B Permit Application by August 30, 1990. We request that the submittal deadline for the revised Kent Facility permit application be extended by 2 months to October 30, 1990, for reasons discussed in our recent meeting.

The entire Part B Permit Application for the Kent Facility (submitted in November 1988 by the facility's previous owners) will require extensive modification. The revisions will amount to a total re-write in order to provide the level of information you have required in Part B permit applications for other Chempro facilities. This is the main reason behind our request for an extension.

CHEMICAL PROCESSORS, INC.

Park 90/5, Suite 400 • 2203 Airport Way South • Seattle, Washington 98134
(206) 223-0500 • FAX: 223-7791

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The NODs addressed by our staff in recent months, now to be addressed in both the Pier 91 and Kent Facility permit applications, have not been as similar or generic as Ecology's correspondence implies. Our review of the most recent Tacoma, Georgetown, and Washougal NODs showed a total of 135 NOD questions covering approximately 20 different topics. Of the 135 separate NODs, fewer than 30 were duplicated in NODs for 2 or more of the facilities. Responses to these NODs, and preparation of related revisions to the permit applications, has been a full-time job in recent months. It will still require substantial effort to incorporate these revisions into the 2 remaining permit applications.

Chempro's Regulatory Affairs staff will also be working between now and early August to complete other projects with tight deadlines. These projects include Washougal permit application revisions to be submitted by May 31, Pier 91 Facility permit application revisions to be submitted July 1, and (for EPA) PCB permit applications for 3 Chempro facilities, to be submitted August 1.

Response to this request by or before the end of May 1990 will be appreciated, so we may plan accordingly. Again, thank you for the opportunity to discuss scheduling and other Part B issues with you in our recent meeting. We look forward to additional productive sessions of that kind.

I can be reached at 223-0500 if you have any questions.

Sincerely,



Catherine L. Buller
Environmental Programs Manager

cc: Carrie Sikorski, EPA
Robert Carruthers, Ecology

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